

## KOHN, SWIFT &amp; GRAF, P.C.

ONE SOUTH BROAD STREET, SUITE 2100  
PHILADELPHIA, PENNSYLVANIA 19107-3304

JOSEPH C. KOHN  
ROBERT A. SWIFT  
GEORGE W. CRONER  
ROBERT J. LAROCCA  
DENIS F. SHEILS\*  
DOUGLAS A. ABRAHAMS \*  
WILLIAM E. HOESE  
STEVEN M. STEINGARD \*  
STEPHEN H. SCHWARTZ  
CRAIG W. HILLWIG  
BARBARA L. MOYER \*

(215) 238-1700  
TELECOPIER (215) 238-1968  
FIRM E-MAIL: [info@kohnswift.com](mailto:info@kohnswift.com)  
WEB SITE: [www.kohnswift.com](http://www.kohnswift.com)  
E-MAIL: [RSwift@KOHNSWIFT.COM](mailto:RSwift@KOHNSWIFT.COM)

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MAROLYN K. KOHN
1914-1999

OF COUNSEL  
MERLE A. WOLFSON  
LISA PALFY KOHN

\* ALSO ADMITTED IN NEW YORK  
\* ALSO ADMITTED IN NEVADA  
\* ALSO ADMITTED IN NEW JERSEY

December 4, 2015

VIA FAX and ECF

Honorable Alvin K. Hellerstein  
Room 1050  
United States Courthouse  
500 Pearl Street  
New York, NY 10007

Re: Aldo Vera v. The Republic of Cuba, No. 12 Civ. 1596

Dear Judge Hellerstein:

I represent Aldo Vera in the above matter. On October 30, 2015, Vera and the other judgment creditors filed eight (8) motions for summary judgment as to the banks' pending interpleader complaints. Pursuant to your Order, the banks had until December 1 to file oppositions. At the request of the banks, your Honor extended the time for the banks to respond to December 4 -- today.

I write to request a further extension of time. The banks and judgment creditors are close to settling all the pending motions. Draft agreements have been circulated for approval and there have been numerous e-mails and phone calls to resolve differences. We hoped to present your Honor with consent orders today, but there are still a few issues remaining which will take us into next week.

A one week extension should be sufficient to complete these negotiations. The banks' time to file oppositions will be extended to December 11 and the judgment creditors' time to file replies will be extended to December 22. Messrs, Kerr and Feigenbaum, who represent the banks, consent to the extensions.

Respectfully yours,

Robert A. Swift

RAS/yr  
Cc: All Counsel via ECF